

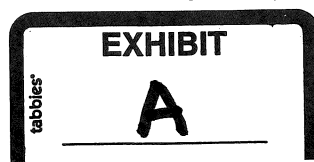
28 U.S.C. § 1746 DECLARATION OF SERGIO CONTRERAS

1. My name is Sergio Contreras. I am over the age of eighteen (18), and I am competent and qualified to make this Declaration. I have personal knowledge of the facts in this Declaration and they are true and correct.

2. I am a former employee of Land Restoration LLC and Land Restoration Holdings LLC ("Land Restoration"). I worked at Land Restoration from approximately 2012 to approximately 2014. Land Restoration is a business that does residential and commercial landscaping design, construction and maintenance, often for very expensive luxury homes and properties. I was a worker and manual laborer for Land Restoration and I dug trenches and holes for irrigation systems, installed lawn turf and planted trees and plants, delivered, loaded and unloaded landscaping materials, and worked on various landscaping, maintenance and construction projects. At any one time, Land Restoration employed approximately 10 to 15 workers who did manual labor similar to me.

3. During my employment at Land Restoration, I regularly worked more than forty hours per week. However, Land Restoration did not pay me and the other workers overtime pay for any hours worked over 40 in a work-week. During most of my employment, Land Restoration just paid the same hourly rate for all hours worked, no matter how many were worked in a week. In the last approximately two months of my employment, Land Restoration switched to paying a non-changing daily amount no matter how many hours were worked in a day.

5. Even when I was paid hourly, Land Restoration regularly failed to pay me and my coworkers for all hours worked. The foreman named Roberto would write down hours for us, but Land Restoration would not include all the hours we worked. When I would tell Roberto that he had not included all the hours, he would just say words to the effect of "well that's what



we are paying you for.”

6. I know that the other workers/manual laborers at Land Restoration also were paid in the same way I was paid and did not receive overtime pay or rates for hours worked over 40 hours a week and were not paid for all hours worked. I know this from my conversations with other coworkers where we talked about how we were paid and how we did not get paid overtime and were not paid for all the hours we worked. My coworkers and I frequently complained to each other that we were not being paid overtime. I also talked about this with foreman Roberto but he just told me words to the effect that this is how Land Restoration pays and that if I don't like it I can look elsewhere.

7. I have talked to other worker/workers who are still employed by Land Restoration. They do not want to be identified because they are afraid of retaliation. They are afraid of joining this lawsuit because they are afraid they will be fired or retaliated against. I believe other workers would be interested in joining this lawsuit and want to be paid for the overtime that they worked and were not paid, but they are afraid of being fired or retaliated against. Some workers at Land Restoration may also be scared to join this lawsuit because of possible issues about their residency or citizenship and they don't want to be turned in or reported because they participate in this lawsuit.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 14 day of January, 2017.

Sergio Contreras
Sergio Contreras

Translators Certificate:

I certify that I am fluent in both Spanish and English and that I translated this document to Sergio Contreras in Spanish, and he affirmatively indicated that he understood its contents and significance.

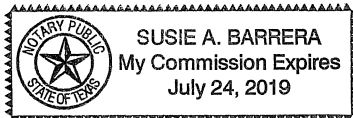
Translator: Susie A. Barrera

Date: 1-14-2017

State of Texas §

County of Travis §

Subscribed and sworn before me, this 14th day of January, 2017.



Susie A. Barrera